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BRANDEE CHAMBERS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NERINDA ROBINSON, Individually,
Plaintiff,

vs.

GREAT CLIPS, INC., a Foreign
Corporation; BEETEE #2, LLC, a
Domestic Limited Liability Company;
BRANDEE CHAMBERS, individually,
Defendants.

Case No. 2:15-cv-01162-APG-VCF

**STIPULATION AND ORDER TO
CONSOLIDATE EARLY NEUTRAL
EVALUATION SESSIONS**

Plaintiff NERINDA ROBINSON (“Plaintiff” or “Robinson”) and Defendant BRANDEE CHAMBERS (“Defendant” or “Chambers”), by and through their respective counsel of record, hereby stipulate and agree to consolidate the Early Neutral Evaluation (“ENE”) Session in this case, scheduled on January 14, 2016 at 1:30 p.m. before the Honorable Peggy A. Leen, and the ENE in Case No. 2:15-cv-00714-GMN-VCF scheduled on November 9, 2015 at 9:00 a.m. before the Honorable George Foley, Jr. The parties desire to consolidate the ENE Sessions as the cases are interdependent on one another and judicial economy will be served with consolidation.

Indeed, one cannot discuss the merits of the factual allegations and claims in one case without discussing the merits of the factual allegations and claims in the other case. Robinson’s operative complaint is premised on her alleged complaints to manager Sarah Hughes (“Hughes”)

1 which resulted in Robinson's termination. (Dkt. #19, at ¶¶16-19). Hughes' (the plaintiff in Case
2 No.: 2:15-cv-00714-GMN-VCF) operative complaint is premised on alleged complaints made by
3 Robinson to her and Hughes' subsequent termination. (Case No. 2:15-cv-00714-GMN-VCF, Dkt.
4 #21, at ¶¶14-18). Chambers is a defendant in each case, represented by the same counsel in both
5 cases, and Robinson and Hughes are represented by the same counsel in both actions. To promote
6 judicial economy and avoid wasting judicial resources, the parties respectfully request that the ENE
7 Sessions be consolidated into one ENE Session.¹

8 The parties propose that the consolidated ENE proceed on January 14, 2016 at 1:30 p.m.
9 before the Honorable Peggy A. Leen, as this date and time is mutually agreeable between the parties
10 and is set for an ENE to be conducted.

11 ...

12 ...

13 ...

28 ¹ This Court has excused Defendant Great Clips, Inc. from participating in an ENE. (Dkt. #12).

1 This stipulation is sought in good faith, and not for the purpose of undue delay.

2 Dated: October 22, 2015

Dated: October 22, 2015

3 Respectfully submitted,

Respectfully submitted,

4
5 /s/ Ruth L. Cohen

/s/ Crystal J. Herrera

6 RUTH L. COHEN, ESQ.
7 PAUL S. PADDA, ESQ.
THE FEDERAL DEFENDERS LAW
GROUP

PATRICK H. HICKS, ESQ.
CRYSTAL J. HERRERA, ESQ.
LITTLER MENDELSON, P.C.

8 Attorneys for Plaintiff,
9 NERINDA ROBINSON

Attorneys for Defendant,
BRANDEE CHAMBERS

10
11 **ORDER**

12 **IT IS SO ORDERED** that the ENE in this case shall be consolidated with the ENE Session
13 in Case No. 2:15-cv-00714-GMN-VCF, and continue to be scheduled on January 14, 2016 at 1:30
14 p.m. before the Honorable Peggy A. Leen.

15 Dated: October 27
16 _____, 2015.

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18
19 UNITED STATES MAGISTRATE JUDGE